

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC, and Bernard L. Madoff,

Plaintiff,

v.

STANLEY SHAPIRO, *et al.*,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05383 (SMB)

**STIPULATION EXTENDING BRIEFING SCHEDULE AND
SETTING HEARING DATE ON DEFENDANTS' MOTION TO
DISMISS THE TRUSTEE'S SECOND AMENDED COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which defendants Stanley Shapiro, Renee Shapiro, S&R Investment Co., LAD Trust, Rachel Shapiro, David Shapiro, David Shapiro 1989 Trust, as amended, Trust f/b/o W.P.S. & J.G.S., Leslie Shapiro Citron, Leslie Shapiro 1985 Trust, as amended, Trust f/b/o A.J.C., K.F.C., and L.C.C., as amended, and Kenneth Citron (collectively, "Defendants") shall reply to the Trustee's opposition to Defendants' motion to dismiss the Trustee's Second Amended Complaint is extended up to and including

December 1, 2014. The hearing in the Bankruptcy Court on Defendants' motion to dismiss is scheduled for February 19, 2015, at 10:00 a.m.

Nothing in this stipulated extension ("Stipulation") is a waiver of the Defendants' right to request from the Court a further extension of time to answer, move against, or otherwise respond to the Complaint and/or the Trustee's right to object to any such request. The parties to this Stipulation reserve all other rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photocopy, or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 7037).

Dated: November 17, 2014
New York, New York

By: /s/ Ona T. Wang
BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Fernando A. Bohorquez
Email: fbohorquez@bakerlaw.com
Ona T. Wang
Email: owang@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Estate of Bernard L. Madoff*

By: /s/ Gabrielle J. Pretto
LAX & NEVILLE, LLP
1450 Broadway, 35th floor
New York, New York 10018
Telephone: (212) 696-1999
Facsimile: (212) 566-4531
Brian J. Neville
Email: bneville@laxneville.com
Barry R. Lax
Email: blax@laxneville.com
Gabrielle J. Pretto
Email: gpretto@laxneville.com

*Attorneys for Defendants Stanley Shapiro, Renee
Shapiro, S&R Investment Co., LAD Trust, David
Shapiro, Rachel Shapiro, David Shapiro 1989
Trust, Trust f/b/o W.P.S & J.G.S., Leslie Shapiro
Citron, Leslie Shapiro 1985 Trust, Trust f/b/o
A.J.C., K.F.C., and L.C.C., and Kenneth Citron*